



December 27, 2005

Daniel C. Smith  
Associate Administrator for Safety Assurance  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, DC 20590

**Re: Part 573 Defect Information Report**

Dear Mr. Smith:

Pursuant to the requirements of 49 C.F.R. Part 573, Michelin North America, Inc. ("MNA") submits the following report related to certain tires manufactured under Federal Motor Vehicle Safety Standards (FMVSS) No. 109 (New Pneumatic Tires).

573.6(c)(1) Name of Manufacturer:

Manufacture Française des Pneumatiques Michelin (MFPM), a French company located in Clermont-Ferrand, France.

573.6(c)(2)(iii) Items Potentially Containing the Defect:

Michelin Pilot Sport tires, size 255/35ZR20 97Y Extra Load ("Subject Tires"), that were periodically manufactured at the Cataroux plant in Clermont-Ferrand France during 2000 – 2003, and 2005. The Subject Tires are identified by the DOT tire identification number beginning with FH PN EFMX, and ending with the manufacturing year code of 00, 01, 02, 03, or 05.

573.6(c)(3) Total Number of Tires Potentially Containing the Defect:

Approximately 2,000 of the Subject Tires were imported into the U.S. for replacement sales, and approximately 4,100 tires were imported on some trim levels of Jaguar XJ8 vehicles shipped to the U.S. in 2003, 2004, and 2005.

It is estimated that 4,600 of these tires are still in service.

573.6 (c)(4) Percentage of Tires Estimated to Actually Contain the Defect:

Approximately 3 – 4% of the Subject Tires may contain the defect.

Michelin North America, Inc.

One Parkway South  
P.O. Box 19001  
Greenville, South Carolina 29602-9001  
Tel: 864/458-5000



#### 573.6(c)(5) Description of the Defect

The Subject Tires may develop a circumferential blister in either tire sidewall due to a partial separation between the carcass ply and the bead stiffener. The partial separation is a result of a process variation in the finishing position of the two sidewall components. The described blister results in tire vibrations which are typically detected by the user.

MNA is unaware of any incidents in the U.S. of tire failures in the field, or any injuries or property damage related to this condition in the Subject Tires.

#### 573.6(c)(6) Basis For Determination of Defect:

Three (3) tires were returned through the customer returns system in Europe due to reported rapid air loss. On the basis of this information and related analysis, MFPM has instituted actions to replace the Subject Tires sold in its market.

As stated above, MNA is unaware of any incidents in the U.S. of tire failures in the field, or any injuries or property damage related to this condition in the Subject Tires. However, in an abundance of caution, MNA has determined that it will conduct a voluntary safety recall of the Subject Tires that were imported into the U.S.

#### 573.6(c)(8) Remedy Program:

As indicated above, MNA will initiate a voluntary safety recall for the Subject Tires. U.S. consumers will be contacted by first class mail beginning the week of January 16, 2006. This correspondence will explain the issue and include instructions for obtaining replacement tires without charge, as well as procedures for collecting reimbursement for remedies made prior to the recall, where appropriate.

MNA will also issue a press release explaining the program for those customers for which owner records are not available.

#### 573.6(c)(9) Disposition of Recalled Tires

In accordance with the provisions of 49 CFR § 573.6(c)(9)(i-iii), MNA will make its dealers aware of the dealer requirements that became effective in connection with the disposition of recalled tires. A dealer notification is enclosed pursuant to 49 CFR § 573.6(c)(10). The program for disposing of recalled tires returned to MNA will comply with applicable state and local law regarding the disposal of tires, and to the extent possible, will be channeled into a category of positive reuse or beneficial non-vehicular use.

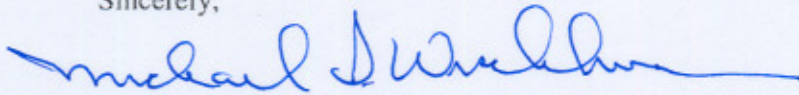


573.6(c)(11) Owner Notification

MNA's owner notification letter is enclosed.

Please feel free to call me if you have any questions.

Sincerely,



Michael I. Wischhusen  
Director, Industry Standards & Government Regulations  
Michelin North America, Inc.

Phone: (864) 422 - 4220

Enclosures:

1. Owner's notification letter
2. Dealer notice letter
3. Press release